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Attorneys at Law

April 30, 1986

RECEIVED

MAY 2 1986

REGION I
OFFICE OF REGIONAL COUNSEL

E. Michael Thomas, Esq.
EPA Office of Regional Counsel
JFK Building, Room 2203
Boston, Massachusetts 02203

Re: The Cannons Engineering Corporation site in Bridgewater, Massachusetts; the Cannons Engineering Corporation site in Plymouth, Massachusetts; the Gilson Road site in Nashua, New Hampshire; and the Tinkham Garage site in Londonderry, New Hampshire, hereinafter collectively referred to as the Sites

Dear Mr. Thomas:

Our client, Olin Corporation ("Olin"), has referred to our attention the letter of Merrill S. Hohman, Director Waste Management Division, United States Environmental Protection Agency, dated March 28, 1986, regarding the above matter. In that letter, Mr. Hohman states that Olin is a "potentially responsible party" with respect to the sites and "encourages" Olin to undertake voluntarily the clean-up activities that EPA has determined are required at the Sites.

At the present time, Olin does not have sufficient information to properly evaluate EPA's request. For example, EPA has not provided Olin with the factual basis to support its claim that Olin is a potentially responsible party with respect to the Sites. Nor does Olin have information as to the contemplated cost of the suggested response activities, the extent, if any, to which Olin activities are causally related to the alleged releases of hazardous substances at the Sites, or the potential responsibility of other parties for the alleged releases of hazardous materials. In addition, there are numerous complex and novel legal issues raised by EPA's notice letter.

In response to EPA's request pursuant to section 104(e) of CRCLA and section 3007 of RCRA, Olin is continuing its search for documents. It is anticipated that this search will be



E. Michael Thomas, Esq.
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completed by May 30, 1986. To assist Olin in its search we would appreciate receiving any summary information that connects Olin with the Sites and an example of a bill of lading, invoice, or the like which EPA believes confirms the delivery of waste material to the Sites by Olin. In addition, we would like to receive the dates within which your records indicate that Olin transported materials to the Sites.

Nothing contained herein should be construed as an admission by or be binding on Olin. The purpose of this letter is to formally respond to EPA's March 28, 1986 letter to Olin to request additional data and information in order for us to further evaluate EPA's contention that Olin generated waste material disposed of at the Sites which, in fact, will result in a release or threatened release of contaminants into the environment.

If you have any further questions, do not hesitate to contact me.

Very truly yours,



Gregory L. Benik

GLB:nrb

cc: Greg J. Wilson
Massachusetts Dept. of Attorney General